



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

Memorandum

Subject: Annual Monitoring Network Plans

From: Matthew Lakin, Chief
Air Quality Analysis Office, Air Division, Region 9

To: Region 9 Air Pollution Control Agencies

This document outlines the information that is required to be submitted to EPA Region 9 as part of the Annual Monitoring Network Plans due annually by July 1st. We thank you for the time and attention you pay each year while developing these documents. The plans allow the public and EPA to understand your monitoring network, and provide an opportunity for agencies to reflect on their existing networks.

Over the years, many agencies have refined their plans and added information to create a more comprehensive picture of their monitoring networks. Recently, it has become apparent that a lack of detail in these network plans may result in legal vulnerabilities. Lack of information sufficient to determine network adequacy may therefore result in EPA's disapproval of all or a portion of a plan. Given this new attention to network plans, we thought it appropriate to send an update to EPA Region 9's "Annual Monitoring Network Plan for 2007" memo. This updated memo provides information reflecting changes in regulation since 2007, and highlights plan elements that are not always addressed to the desired level of detail. We recognize that this memo is being sent only a few months before plans are due, and that agencies typically produce plans well ahead of July 1st in order to provide time for internal review and public notice and comment. We hope that you will be able to address the elements noted in this memo this year, and will be looking for all elements to be addressed next year.

In addition, an Annual Monitoring Plan template and CFR Elements appendix are attached. The template provides an optional network plan format that incorporates elements required to be included in network plans, including an example detailed site information table that includes required site-level information. State and local agencies are not required to follow this exact format, but must ensure that their network plans cover all required information outlined in the template and the appendix. EPA strongly encourages all agencies to, at a minimum, include the tables suggested in the template. The appendix provides the regulatory basis for the annual network plan. Agencies are also encouraged to include additional information that describes the ambient air monitoring network.

Specific Section Notes

EPA has noticed that the following plan elements are not always addressed to the desired level of detail:

- **Minimum Monitoring Requirements.** Agencies should provide the information detailed in the attached table, including information on design values and CBSAs/MSAs.
- **Collocation.** It is often difficult to tell from reading network plans whether collocation requirements are being met. See attachments for collocation requirements and suggestions for how to address these requirements in your network plans.
- **Detailed Site Information tables.** While all agencies have included site information tables, often information is missing, or the incorrect type of information is provided. See attachment, and specific examples listed below.
 - **Sampling Frequency for PM2.5 and PM10 sites.** Sampling frequencies should be determined in accordance with 40 CFR 58. For easy reference, EPA is enclosing attachments that describe how sampling frequency should be determined for each site.
 - **PM2.5 information.** When filling out the detailed site information tables, please ensure that your PM2.5 information is correct. This includes information on collocation, continuous versus filter-based instruments, FEM/FRM/non-FEM/non-FRM, regulatory or non-regulatory (see attachments).

In addition, there have been many changes to monitoring requirements since 2007. The specific requirements as of February 2012 are included in the CFR Elements appendix (attached).

General changes include new:

- NCore requirements (stations operational by January 1, 2011)
- Pb requirements: source-oriented (1.0 tpy or greater – monitors by January 1, 2010; 0.50 tpy – monitors by December 27, 2011), airport study monitors (by December 27, 2011), at urban NCore stations (population of 500,000 or greater – by January 1, 2012)
- SO2 requirements (operational by January 1, 2013)
- NO2 requirements (address in July 1, 2012 plan)
- CO requirements: in CBSAs of 2.5 million persons or more (address in July 1, 2014 plan); other CO monitors (address in July 1, 2016 plan)

Attachments

Attached are several documents outlining requirements and providing clarification on specific plan elements. State and local agencies are not required to include the exact tables included in the attachments, however, EPA strongly encourages all agencies to include the tables. Regardless of how the information is presented, agencies must ensure that their network plans include all required information. The appendix provides the regulatory basis for the annual network plan. Agencies are also encouraged to include additional information that describes the ambient air monitoring network. Attachments:

- Outline of CFR Requirements
- Site and monitor type description
- Detailed site information table
- Minimum monitoring requirements table
- Sampling frequency information – PM10 and PM2.5
- PM2.5 Reference Memos
- Collocation information for PM10, PM2.5, and Pb

General Network Plan Overview

Submittal date: States must submit an annual network plan on July 1, 2007 to the Regional Administrator.

Public Inspection/Comment: The annual monitoring network plan must be made available for public inspection (website, hardcopy posting in libraries and public offices, and/or newspaper listing) for at least 30 days prior to submission to EPA. Although not required, EPA recommends soliciting comments concurrent with the public inspection period. Evidence of public inspection must be submitted. If an opportunity for public comment had been provided, comments received must be included in the annual network plan submission.

Types of Monitors to include in plan: Include establishment and maintenance of an air quality surveillance system that consists of the following:

1. SLAMS
2. FRM
3. FEM
4. ARM
5. NCORE
6. STN
7. PAMS
8. SPM

Network modifications: A network plan that proposes SLAMS network modifications including new monitoring sites is subject to the approval of the EPA Regional Administrator.

We look forward to your network plan submittals. Please contact myself, Matt Lakin, at 415.972.3851 or lakin.matthew@epa.gov, or any of my monitoring team staff, should you have any questions, or should you desire a copy of the 2007 memo EPA Region 9 sent regarding network plans.

